

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

C.A. #2004-11026-RWZ

Mr. Jason A. Morris
Petitioner

-Vs-

Ms. Carol Mici
Respondent

FILED
IN CLERKS OFFICE
JUN 23 P 12:19
U.S. DISTRICT COURT
DISTRICT OF MASS.

PETITIONER'S MOTION TO AMEND PETITION AFTER COUNSEL IS APPOINTED

Now comes the Petitioner, Mr. Jason A. Morris who is Pro-Se and would ask respectfully that Counsel be appointed to this issue due to the lack of Legal education and/or formal education and that he is unable to articulate these claim[s] properly, Counsel should be appointed to help address the claim at hand at any stage or [a]ny proceeding thereof.

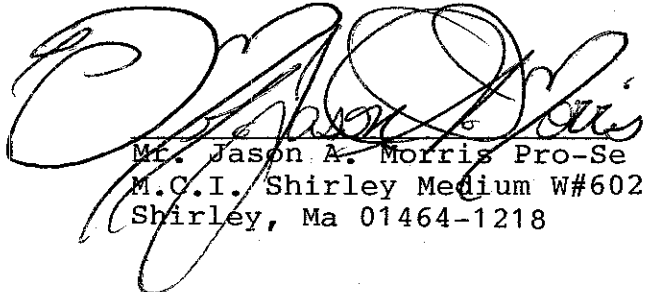
Counsel could further support these claim[s] of Constitutional error and in the same breath protect this Petitioner's Constitutional Right[s] at every important stage in these proceedings. That being said the Petitioner would ask respectfully atleast 60 Days to amend after Counsel is appointed. Due to the above set of facts Counsel would be appropriate for the first time in this Appeal, it would be in the interest of justice. Moreover, this Petitioner requests that this Hoonorable Pursuant to Fed. R. Civ. P. Rule #15 in support its only in the best interest of this Court to further allow Counsel to address these claims of error in any appropriate fashion.

THE PETITIONER WOULD RESPECTFULLY REQUEST DUE TO THE
ABOVE-ENTITLED REASON[S] IN SAID MOTION, COUNSEL
BE APOINTED TO FURTHER HELP IN THE MERIT[S] OF THIS
CLAIM.

Respectfully Submitted,

Dated: June 18, 2004,

CC: Filed.



Mr. Jason A. Morris Pro-Se
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